

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAMS FIELD SERVICES	:	
COMPANY, LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	NO. 3:19-CV-1545
	:	
TODD E. GREENWOOD and	:	HON. MATTHEW W. BRANN
JAMES F. GREENWOOD	:	
JEFFREY A. GREENWOOD,	:	
	:	
Defendants.	:	ELECTRONICALLY FILED

**WILLIAMS FIELD SERVICES COMPANY, LLC'S
NOTICE OF WITHDRAWAL OF MOTION FOR
A SPEEDY HEARING ON ITS DECLARATORY
JUDGMENT ACTION PURSUANT TO FED. R. CIV. P. 57**

Plaintiff, Williams Field Services Company, LLC ("Williams"), hereby respectfully provides notice to the Court that it is withdrawing without prejudice the Motion for a Speedy Hearing on its Declaratory Judgment Action Pursuant to Fed. R. Civ. P. 57 (ECF 23), and, in support thereof, states the following:

1. Williams initiated this action on September 6, 2019 with a Complaint requesting declaratory and injunctive relief and an Amended Complaint on January 24, 2020. (*See* ECF 1 and 38.)

2. On November 27, 2019, Williams sought, *inter alia*, a speedy hearing before this Court to determine its rights under a Partial Assignment of rights under an Oil and Gas Lease (the “Lease”) to permit Williams to, among other things, construct a natural gas gathering pipeline on the Bridgewater Township property of Defendants Todd and James Greenwood. (See ECF 23, 24, 33.)

3. The natural gas gathering pipeline has been constructed on the Bridgewater Township property and natural gas is now being produced and gathered from the Greenwood R.P2 well pad for the benefit of the Greenwoods and other leaseholders.

4. As a result, Williams hereby withdraws its Motion for a Speedy Hearing (ECF 23.) without prejudice. Williams reserves the right to file a similar motion in the event that changed circumstances warrant expedited consideration.

WHEREFORE, Plaintiff Williams Field Services Company, LLC respectfully withdraws its Motion for a Speedy Hearing on its Declaratory Judgment Action Pursuant to Fed. R. Civ. P. 57 (ECF 23) without prejudice.

Respectfully submitted,

/s/ Nicholas F. Kravitz

Daniel T. Brier

Nicholas F. Kravitz

Richard L. Armezzani

Myers, Brier & Kelly, LLP
425 Spruce Street, Suite 200
Scranton, PA 18503
(570) 342-6100

Attorneys for Plaintiff,
Williams Field Services Company, LLC

Date: July 17, 2020

CERTIFICATE OF SERVICE

I , Nicholas F. Kravitz, hereby certify that a true and correct copy of the foregoing Notice of Withdrawal of Motion for a Speedy Hearing on its Declaratory Judgment Action Pursuant to Fed. R. Civ. P. 57 was served upon the following counsel of record via the Court's ECF system on this 17th day of July, 2020:

Edwin A. Abrahamsen, Esquire
Abrahamsen, Conaboy & Abrahamsen, P.C.
1006 Pittston Avenue
Scranton, PA 18505

Douglas A. Clark, Esquire
1563 Main Street
Peckville, PA 18452

/s/ Nicholas F. Kravitz
Nicholas F. Kravitz